## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA INDIANAPOLIS DIVISION

JOSIAH JOHNSON AND JENNIFER JOHNSON,

Plaintiffs,

v.

JEREMIAH JOHNSON, THE ALTAR GLOBAL INC., PAUL JOHNSON, AND PAUL T. JOHNSON MINISTRIES,

Defendants.

Civil File No. 1:25-cv-00658-TWP-MG

JURY TRIAL REQUESTED

## PLAINTIFFS' STATEMENT OF POSITION

Pursuant to this Court's Order (ECF No. 38) and LR 16-2, Plaintiffs state as follows what action the Court should take following the transfer of these proceedings to this District:

Plaintiffs filed a response earlier (ECF No. 24) regarding their position on personal jurisdiction and believe this Court should assume jurisdiction over this case. Plaintiffs refer the Court to the parties' briefs on jurisdictional issues and the transfer order, which outline why jurisdiction is proper here.

Defendants have also challenged subject-matter jurisdiction, claiming the Court should decline to exercise jurisdiction over the subject matter under the ecclesial abstention doctrine. (ECF No. 13). These matters have already been briefed, and this motion may have been denied by virtue of the transfer order to this District. In any event, Plaintiffs would urge this Court to

deny Defendants' challenge to this Court's jurisdiction over the subject matter because, among other things, the parties' dispute does not relate to matters of church doctrine, church polity, or theology. Rather, the dispute arises out of public defamatory conduct, false allegations about Plaintiffs' character, and other torts set forth in public, on the internet, and in articles and posts for the world to see, and thus involve the type of disputes that are properly before a federal court. Plaintiffs incorporate their prior brief on these issues. (ECF no. 15).

The parties have also agreed on a proposed Case Management Plan. Thus, Plaintiffs would respectfully request that the Court set this matter for trial as outlined in that Plan and the schedule approved by the Magistrate Judge.

Respectfully submitted,

/s/ Brent W. Huber

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## **CERTIFICATE OF SERVICE**

The undersigned counsel hereby certifies that a copy of the foregoing has been served on all counsel of record for electronic service this 13<sup>th</sup> day of June 2025 by the Court's electronic filing system.

/s/ Brent W. Huber
Brent W. Huber